

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

DEBORA BAYNE, and all other persons similarly  
situated,

Plaintiff,

vs.

NAPW, INC. *d/b/a* National Association of  
Professional Women and *d/b/a* International  
Association of Women, and  
PROFESSIONAL DIVERSITY NETWORK, INC.  
*d/b/a* National Association of Professional Women  
and *d/b/a* International Association of Women,

Defendants.

Docket No.: 18-cv-3591 (MKB)(RER)

**CASE MANAGEMENT  
STATEMENT**

Upon consent of the parties, it is hereby ORDERED as follows:

1. Defendants shall answer or otherwise move with respect to the complaint by: N/A.
2. No additional parties may be joined after: 3/1/19.
3. No amendment of the pleadings will be permitted after: 3/1/19.
4. Date for completion of automatic disclosures required by Rule 26(a)(1) of the Federal Rules of Civil Procedure, if not yet made: 9/13/18.
5. The parties shall make required Rule 26(a)(2) disclosures with respect to:
  - a. Expert witnesses on or before: 3/1/19.
  - b. Rebuttal expert witnesses on or before: 3/15/19.
6. All discovery, including depositions of experts, shall be completed on or before: 4/1/19.
7. Pre-motion letters regarding proposed dispositive motions must be submitted within one (1) weeks following the close of all discovery and responses are due one week later.

Plaintiffs to move for class certification pursuant to Rule 23 of the Federal Rules of Civil Procedure within 30 days following the close of discovery or at such other time as the court directs.

8. The parties do not consent to trial before a magistrate judge pursuant to 28 U.S.C. § 636(c).

9. A Telephone Conference set for \_\_\_\_\_, to be initiated by Plaintiff.

10. Status Conference will be held on \_\_\_\_\_.

11. A Final Pre-trial conference will be held on \_\_\_\_\_.

This scheduling order may be altered or amended upon a showing of good cause not foreseeable at the date hereof.

Dated: Brooklyn, New York

\_\_\_\_\_

\_\_\_\_\_  
RAMON E. REYES, JR.  
UNITED STATES MAGISTRATE JUDGE

JACK L. NEWHOUSE, ESQ. \_\_\_\_\_  
NAME

Attorney for Plaintiff Debora Bayne, et al.

ADDRESS: 40 Broad Street, NY, NY 10004

E-mail: [jnewhouse@vandallp.com](mailto:jnewhouse@vandallp.com)

Tel.: 212-943-9080

Fax: 212-943-9082

GREGORY J. KOWALSKY, ESQ.

MARK S. MULHOLLAND, ESQ. \_\_\_\_\_  
NAME

Attorney for Defendants NAPW, Inc. and  
Professional Diversity Network, Inc.

ADDRESS: 1425 RXR Plaza,  
Uniondale, NY 11556

E-mail: [gkowsky@rmfpc.com](mailto:gkowsky@rmfpc.com)

Tel.: 516-663-6585

Fax: 516-663-6785